

Federal Communications Commission
445 12th Street SW
Washington, DC 20554

December 4, 2014

Dear Sir/Madame,

I am writing today on behalf of **Claiborne County School District**, in response to FCC Chairman Tom Wheeler's recently announced proposal to raise the E-Rate funding cap by \$1.5 billion. The E-Rate program currently represents the only source of federal funding aimed at educational technology and is critical in providing discounts to assist schools, especially to rural systems like ours, to obtain affordable telecommunications and internet access. As Claiborne County School Director in Tazewell, TN *I strongly support the additional funding, and ask you to do the same.*

Claiborne County School District is located in upper East Tennessee, slightly west of Smoky Mountains and more specifically attached to historical Cumberland Gap National Park. The E-Rate is our students' pathway to a better future and it too blazes a trail among the technological mountains that our students face. As a local board of education whose home is within the Appalachian mid-ridgeline's heart of Lone, Clinch, and Powell Mountains, Claiborne County School District covers 435 square miles with the average student's home reporting per capita income of only \$17,128. Over 73% of the near 5000 students enrolled received either free or reduced lunches during the 2013-14 school year at the thirteen rural public schools in our district. The Claiborne County School District uses the infusion of additional funding promoted by the existing E-Rate to capitalize frugally upon the opportunity provided by the technology dollars necessary to support our students and their 333 teachers in the classrooms. This is especially poignant when considering the increasing demand of funding dollars necessary to prepare our students for a much larger global economy; regardless their economic circumstances. (Over one third of our students' homes, according to the US Census, are significantly below poverty and borderline to homeless.) Simply put, *without the additional dollars the E-Rate provides, how will we procure preparation for our students to have a better future, if ultimately compromising that made possible by the E-Rate within the present?* I urge you to become pro-active in our students' futures and choose to support the E-Rate in the present.

To raise the cap of the E-Rate program by \$1.5 billion, the Universal Service Fund fee will increase by 16 cents per month per account. Sixteen additional cents per month (\$.16 per MONTH) —less than half a penny per day— totals to an additional \$1.92 per year, approximately the cost of a cup of coffee. This proposal is both reasonable and justified, asking contributors to forgo one cup of coffee over the course of a year to ensure that our nation's schools and libraries stay connected to the internet in a way that supports 21st century learning and prepares them for post-secondary opportunity.

No one questions that it is time to ensure that our libraries and schools are connected with the quality of connectivity that is sufficient and scalable for today's ever-growing connectivity needs. In less than twenty years since Congress established the program, E-Rate played a critical role in transforming levels of connectivity from less than one-quarter of schools and libraries to nearly all connected today. The E-Rate program's work is not finished! Achieving the laudable broadband goals adopted by the Commission in July will require additional investment. The biggest obstacle the E-Rate program faces, even with the recent changes, remains the strain of increasing demand for E-Rate-supported services and persistently low funding.

The single most effective step the FCC can take to bolster E-Rate's current and future success is to ensure that the program's funding is adequate to support, in a sustainable manner, the program's changes and goals as adopted in July. Chairman Wheeler's proposal does just that, representing a deliberate effort to expand educational

opportunities for our nation's students. By focusing on high-capacity broadband connections to the internet (particularly those in rural communities) and providing sustained, additional funding to the E-Rate program, the modernized E-Rate will ensure the nation's schools—including mine—are able to keep pace with ever increasing connectivity needs.

As a representative of Claiborne County School District in rural East Tennessee, I also am concerned with the definition of 'rural' as used within the proposed E-Rate program. This is because in July, the FCC adopted a new definition of the term 'rural' and because of the "new" definition, I urge the FCC to modify the definition of rural as used in the E-Rate program. Specifically, I am opposed to the use of 'urban clusters' to define rural without a population threshold, as the term inappropriately captures more than 1,500 rural schools and public libraries in the broad category of 'urban cluster,' denying them the additional rural E-rate discount for which they should qualify. I am concerned that the FCC has adopted a specific definition of rural for that will come with unintended consequences. The adopted definition works counter to the stated goal of helping close the connectivity gap, by potentially exacerbating the gap that exists between rural and non-rural areas. Loss of the critical 'rural' discount widens the affordability gap that many rural schools and libraries struggle with daily. I urge the FCC to modify its definition so that a population of 25,000 or greater be considered urban. This proposal recognizes the FCC's interest in modernizing the E-Rate rural definition in a census-centric manner while allowing schools and libraries in urban clusters with populations below 25,000 to be considered rural for the purposes of the E-Rate program. This specific proposal was recently submitted in a joint filing of 22 national organizations representing a broad cross-cut of E-Rate stakeholders, a bold, strong show of unanimity.¹

Thank you for considering my response as you move forward with your decision on the E-Rate program and its funding. I applaud Chairman Wheeler and the FCC for its continued efforts to protect the already oversubscribed E-Rate program by ensuring the future of this successful program.

Sincerely,

Mata J.Banks

Mata Banks, Ed.D
1309 Legion Street,
Tazewell, TN 37879
PHONE: (423) 526-9835
FAX: (423) 526-9898

¹ 22 National Organizations Urge FCC to Modernize Definition of Rural in E-Rate (Response to Petition to Reconsider, [PDF](#))